



I. Case Development / Background Investigation / Case Administration

Date	Description	Time
8/1/12	Meet and confer with client re status of matter; review and revise complaint.	.8
8/1/12	Review SDAT records re agent for service of process.	.3
8/3/12	Attempt service of process at Himelfarb's office in Cabin John, MD.	1.9 – GRATIS
8/3/12	Prepare Summons, Complaint, and related materials for service via Certified Mail.	.4 – GRATIS
8/13/12	Tele conf. with S. Himelfarb re status of matter. (.2 hrs). Tele conf. with client re same. (.2 hrs). Review file materials. (.1 hrs).	.5
8/14/12	Tele conf. with S. Himelfarb re status of claims and matter.	.2
8/15/12	Draft 3pg demand ltr to Himelfarb re wage demands. Review and revise. Transmit via fax. (1.2 hrs)	1.2
8/15/12	Draft comm. to client attaching [demand letter to Himelfarb].	.1
8/24/12	Review 2pg letter from Himelfarb accusing Plaintiffs' counsel of misconduct, [discussing] wage claims, etc.	.2
8/24/12	Draft 2pg letter in response [to Himelfarb's letter]; review and revise.	.8
9/5/12	Tele conf. with client re payroll practices of Defendant, and closure of Laurel store.	.6
9/13/12	Tele conf. with client; review payroll records.	.2
10/3/12	Tele conf. with potential witness re wage/hour claims against Monster Auto Group.	.5
11/19/12	Meet and confer with client re wage claims and records.	.3
12/11/12	Draft [communication] to client re status of matter.	.2 - GRATIS

TOTAL: 5.7 hrs

II. Pleadings

Date	Description	Time
8/1/12	Draft Verified Collective Action Complaint; review and revise.	1.9
8/1/12	Draft Summons re A&H Motors, Inc. Draft civil cover sheet. Prepare Verified Collective Action Complaint for filing. File via ECF.	.9
8/1/12	Review ECF filings and issued summons.	.2
8/8/12	Draft Affidavit of Service; review and revise. File via ECF.	.6
8/24/12	Review filing of Answer and Corporate Disclosure of Interest.	.3

10/16/12	Draft Consent to Magistrate Judge. Review and revise. File via ECF.	.2
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TOTAL: **4.1 hrs**

III. Written Discovery

Date	Description	Time
10/16/12	Review Court Order re discovery conference call. Review proposed [Scheduling Order].	.1
10/16/12	Draft comm. to opposing counsel re initial issues; review response.	.2
10/16/12	Tele conf. with Chambers re [Scheduling Order].	.2
11/9/12	Draft [Interrogatories] to Defendant. Review and revise.	.9
11/9/12	Draft [Request for Production of Documents]. Review and revise. Transmit	.8

TOTAL: **2.2 hrs**

IV. Depositions

Date	Description	Time
10/2/12	Review letter from Himelfarb re demand for deposition date [of Plaintiff].	.1

TOTAL: **.1 hrs**

V. Motions Practice

Date	Description	Time
11/29/12	Draft comm. to K. Pilger re amendment of complaint and filing of motion for conditional certification. Review response.	.2
11/29/12	Review Offer of Judgment.	.1
12/8/12	Tele conf. with client re offer of judgment.	.3
12/9/12	Draft comm. to K. Pilger re Offer of Judgment; draft acceptable format and attach same.	.4
12/10/12	Review comm. from Pilger re status of matter.	.1
12/11/12	Review communication and Offer of Judgment from Defendants.	.1
12/11/12	Draft Notice of Acceptance, proposed Order of Judgment. Review and revise.	.3

12/11/12	File [Notice of Acceptance and proposed Order of Judgment] via ECF.	.1

TOTAL: **1.6 hrs**

VI. Attend Court Hearings

Date	Description	Time

VII. Trial Preparation and Post-Trial Motions

Date	Description	Time

VIII. Attending Trial

Date	Description	Time

IX. ADR

Date	Description	Time
10/22/12	Tele conf. with K. Pilger re mediation dates.	.1
11/6/12	Review Order re settlement conference.	.1
11/6/12	Tele conf. with client re mediation date; draft comm. to client re same.	.1
11/6/12	Draft comm. to K. Pilger re documents for mediation.	.1
11/7/12	Draft 3 pg. mediation letter to Judge Connelly. Review exhibits re same.	1.6
11/8/12	[Continue to draft,] [r]eview and revise 4 pg. mediation to Judge Connelly. Prepare exhibits. Transmit.	1.9
11/14/12	Tele conf. with [client] re mediation, strategies re same and damage demands.	.2
11/15/12	Mediation. Travel to and from Greenbelt Court from Rockville office. (1.2 hours – both ways).	6.7
11/15/12	Meet and confer with client [prior to and subsequent to failed mediation]. (12:50 to 1:00 pm and 5:50 to 6:10)	.5

TOTAL: **11.3 hrs**

X. Fee Petition Preparation

Date	Description	Time
12/12/12	Review time slips; excise unnecessary work and prepare accounting of costs. (.4 hr) Draft comm. to Pilger re same; proposing payment for costs and fees without litigating same. (.2 hrs)>	.6
12/18/12	Prepare time in format required by Local Rules.	.6
12/18/12	Prepare Motion for Attorneys' Fees and Costs; review and revise same.	3.7
12/18/12	File Motion for Attorneys' Fees and Costs via ECF.	.1

TOTAL: 5 hrs

GRAND TOTAL: 30.0 hours at \$300.00 = \$9,000.00

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Invoice submitted to:
Monster Auto FLSA Litigation
c/o Lawrence Nelson
8223 Imperial Drive
Laurel MD 20708

Invoice Date	Invoice Number	Last Bill Date
December 18, 2012		

In Reference To: Monster Auto Group FLSA Litigation

Professional Services

		Hrs/Rate	Amount
8/1/2012	Draft Verified Collective Action Complaint; review and revise. (1.9 hrs). Meet and confer with client re status of matter; review and revise Complaint. (.8 hrs).	2.70 300.00/hr	810.00
	Draft Summons re A&H Motors, Inc. Draft civil cover sheet. Prepare Verified Collective Action Complaint for filing. File via ECF. (.9 hrs). Review SDAT records re agent for service of process. (.3 hrs). Review ECF filings and issued summons. (.2 hrs).	1.40 300.00/hr	420.00
8/8/2012	Draft Affidavit of Service. Review and revise, file via ECF.	0.60 300.00/hr	180.00
8/13/2012	Tele conf. with S. Himelfarb re status of matter. (.2 hrs). Tele conf. with client re same. (.2 hrs). Review file materials. (.1 hrs).	0.50 300.00/hr	150.00
8/14/2012	Tele conf. with S. Himelfarb re status of claims and matter.	0.20 300.00/hr	60.00
8/15/2012	Draft 3pg demand ltr to Himelfarb re wage demands. Review and revise. Transmit via fax. (1.2 hrs). Draft comm. to client attaching same. (.1 hrs).	1.30 300.00/hr	390.00
8/24/2012	Review 2pg ltr from Himelfarb accusing counsel of misconduct, wage claims, etc. (.2 hrs). Draft 2 pg. ltr in response; review and revise. (.8 hrs). Review filing of Answer and Corp Disclosure of Interest. (.3 hrs).	1.30 300.00/hr	390.00
9/5/2012	Tele conf. with client re payroll practices of Defendant, and closure of Laurel store.	0.60 300.00/hr	180.00
9/13/2012	Tele conf. with client; review payroll records.	0.20 300.00/hr	60.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/2/2012	Draft advertisement on Craigslist re Monster Auto Group class action.	0.40 300.00/hr	120.00
	Review ltr from Himelfarb re demand for deposition date.	0.10 300.00/hr	30.00
10/3/2012	Tele conf. with potential witness re wage/hour claims against Monster Auto Group.	0.50 300.00/hr	150.00
10/4/2012	Tele conf. with potential class member re pay issues.	0.30 300.00/hr	90.00
10/16/2012	Review Court Order re discovery conference call. Review proposed SO. (.1 hrs). Draft comm. to opposing counsel re initial issues; review response. (.2 hrs). Tele conf. with Chambers re SO. (.2 hrs). Draft Consent to Magistrate Judge. Review and revise. File via ECF. (.2 hrs).	0.70 300.00/hr	210.00
10/22/2012	Tele conf. with K. Pilger re mediation dates.	0.10 300.00/hr	30.00
11/6/2012	Review Order re settlement conference.	0.10 300.00/hr	30.00
	Tele conf. with client re mediation date; draft comm. to client re same.	0.10 300.00/hr	30.00
	Draft comm. to K. Pilger re documents for mediation.	0.10 300.00/hr	30.00
11/7/2012	Draft 3pg mediation ltr to Judge Connelly. Review exhibits re same.	1.60 300.00/hr	480.00
11/8/2012	Review and revise 4pg mediation letter to Judge Connelly. Prepare exhibits. Transmit.	1.90 300.00/hr	570.00
11/9/2012	Draft Interrogs to Defendant. Review and revise. (.9 hrs). Draft Req for Prod of Docs. Review and revise. (.8 hrs). Transmit.	1.70 300.00/hr	510.00
11/14/2012	Tele conf. with L. Nelson re mediation, strategies re same, and damage demands.	0.20 300.00/hr	60.00
11/15/2012	Mediation (5.5 hrs). Travel to and from Greenbelt from Rockville (1.2 hrs). Meet and confer with client (12:50 to 1:00 and 5:50 - 6:10; .5 hrs).	7.20 300.00/hr	2,160.00
11/19/2012	Meet and confer with client re wage records and claims. (.3 hrs). Draft conditional cert declaration; review with client. (.7 hrs). Review and revise same. (.1 hrs).	1.10 300.00/hr	330.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
11/20/2012 Research re conditional certification; review recent US D Ct. Maryland cases involving 216(b) collective actions.	2.30 300.00/hr	690.00
11/29/2012 Review Offer of Judgment. (.1 hrs). Draft comm. to K. Pilger re amendment of complaint and filing of motion for conditional certification. (.1 hrs). Review response. (.1 hrs)	0.30 300.00/hr	90.00
12/8/2012 Tele conf. with client re offer of judgment.	0.30 300.00/hr	90.00
12/9/2012 Draft comm. to K. Pilger re Offer of Judgment; draft acceptable format and attach same.	0.40 300.00/hr	120.00
12/10/2012 Review comm. from Pilger re status of matter.	0.10 300.00/hr	30.00
12/11/2012 Review comm. and Offer of Judgment from Defendants. (.1 hr). Draft Notice of Acceptance, proposed Order of Judgment. Review and revise. (.3 hrs). File same via ECF. (.1 hrs). Draft comm. to client re status of matter. (.2 hrs - GRATIS)	0.50 300.00/hr	150.00
12/12/2012 Review time slips; excise unnecessary work and prepare accounting of costs. (.4 hrs). Draft comm. to Pilger re same; proposing payment for costs and fees without litigating same. (.2 hrs).	0.60 300.00/hr	180.00
12/18/2012 Prepare time in format required by Local Rules.	0.60 300.00/hr	180.00
Prepare Motion for Attorneys Fees and Costs.	3.70 300.00/hr	1,110.00
File Motion for Attorneys Fees and Costs via ECF.	0.10 300.00/hr	30.00
For professional services rendered	33.80 36.00	\$10,140.00 9,000.00
Additional Charges :		
8/1/2012 Filing Fee - US District Court	\$ 9,000.00	350.00
11/9/2012 Postage	+ 350.00 66.05	1.80
Total costs	13.40 \$ 9,429.45	\$351.80
Total amount of this bill		\$10,491.80